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April 9, 2021

## VIA E-MAIL

Delaware Department of Justice Carvel State Building Consumer Protection Unit 820 N. French Street, 5th Floor Wilmington, DE 19801

E-mail: security.breach.notification@state.de.us

**Re:** Supplemental Notice of Data Event

Dear Sir or Madam:

Our office continues to represent Dental Care Alliance, LLC and its subsidiaries and affiliates ("DCA") located at 6240 Lake Osprey Drive, Sarasota, FL 34240. We write to supplement our December 7, 2020 notice to your office concerning an incident discovered on October 11, 2020 that may affect the privacy of personal information related to certain Delaware residents.

Since DCA's previous notice, DCA continued its internal review of the files that may have been subject to unauthorized access and determined an additional approximate one thousand three hundred (1,300) Delaware residents were potentially impacted. The information related to these residents includes name, Social Security number, financial account number, dental diagnosis and treatment information, and health insurance information. Notice to these individuals is being provided in substantially the same form as the letter attached as *Exhibit A*. DCA's investigation is now complete and all individuals have been notified.

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Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4775.

Very truly yours,

CARO

Christopher J. Dilenno of MULLEN COUGHLIN LLC

CJD/pls Enclosure

# **EXHIBIT A**

[EXTRA1] Return Mail Processing PO Box 589 Claysburg, PA 16625-0589

April 8, 2021

G3571-L01-0000001 T00001 P001 \*\*\*\*\*AUTO\*\*MIXED AADC 159
SAMPLE A. SAMPLE - L01 MULTI SSN
APT ABC
123 ANY ST
ANYTOWN, ST 12345-6789

Notice of Data Breach

### Dear Sample A. Sample:

[EXTRA1] (hereinafter "Practice") is writing to notify you of an incident that may affect the security of some of your information. The Practice is advising you of its investigation and the steps it has taken in response to the incident. The Practice is also providing you with steps you can take to help protect your information should you feel it is appropriate to do so.

What Happened? On October 11, 2020, the Practice became aware of suspicious activity in its environment and immediately initiated an investigation into the incident. As part of the investigation, which was conducted with the assistance of third-party forensic specialists, it was determined that unauthorized individuals accessed certain files on the Practice's network between September 18, 2020 and October 13, 2020. Therefore, with the assistance of our third-party forensic specialists, we conducted a review of the files at risk to identify any individuals whose sensitive information could be impacted. The review was completed on February 25, 2021. Through the review, the Practice determined that information related to you was contained in the files. Although there is no specific evidence that your information was actually viewed by the unauthorized individuals, and we have seen no evidence to date that any data has been used for malicious purposes, we are providing this notice to you in an abundance of caution.

What Information Was Involved? The information that was potentially subject to unauthorized access includes your: [EXTRA2].

What We Are Doing. The Practice takes the security of information in our care very seriously. You are being notified because your information may have been subject to unauthorized access. This does not mean you are a victim of identity theft. As part of our ongoing commitment to the protection of information in our care, we worked with third-party specialists to reaffirm the security of our systems and to enhance the existing measures we have in place. We also notified the United States Department of Health and Human Services and state regulators, as required.

As an added precaution, the Practice is also offering you access to one (1) year of complimentary credit monitoring and identity protection services through Experian. The cost of this service will be paid for by the Practice. Instructions on how to enroll in the credit monitoring and identity protection services can be found in the enclosure.

What You Can Do. As a best practice, you should always review your account statements for suspicious or unauthorized activity and report any instances of fraud to law enforcement. We also encourage you to review the enclosed Steps You Can Take to Protect Personal Information.

*For More Information.* We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, or need assistance, please call (855) 347-6551 (toll free) Monday through Friday from 9:00 am to 11:00 pm or Saturday and Sunday from 11:00 am to 8:00 pm Eastern Time. The Engagement Number for this matter is DB26355.

Sincerely,

[EXTRA1]

#### STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

To help protect your identity, we are offering a complimentary one-year membership of Experian's<sup>®</sup> IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by**: 06/30/2021 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <a href="https://www.experianidworks.com/credit">https://www.experianidworks.com/credit</a>
- Provide your activation code: ABCDEFGHI

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (855) 347-6551 by 06/30/2021. Be prepared to provide engagement number DB26355 as proof of eligibility for the identity restoration services by Experian.

## **Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit <a href="https://www.annualcreditreport.com">www.annualcreditreport.com</a> or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

- 1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
- 2. Social Security number;
- 3. Date of birth;
- 4. Addresses for the prior two to five years;
- 5. Proof of current address, such as a current utility bill or telephone bill;
- 6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.); and
- 7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-		https://www.transunion.com/credit-
report-services/	https://www.experian.com/help/	help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069	Experian Fraud Alert, P.O. Box	TransUnion Fraud Alert, P.O. Box
Atlanta, GA 30348-5069	9554, Allen, TX 75013	2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788	Experian Credit Freeze, P.O.	TransUnion Credit Freeze, P.O.
Atlanta, GA 30348-5788	Box 9554, Allen, TX 75013	Box 160, Woodlyn, PA 19094

# **Additional Information**

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; <a href="www.identitytheft.gov">www.identitytheft.gov</a>; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 441 4th St. NW #1100 Washington, D.C. 20001; 202-727-3400; and <a href="mailto:oag@dc.gov">oag@dc.gov</a>.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <a href="https://www.oag.state.md.us">www.oag.state.md.us</a>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and <a href="www.ncdoj.gov">www.ncdoj.gov</a>.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; <a href="www.riag.ri.gov">www.riag.ri.gov</a>; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 21 Rhode Island residents impacted by this incident.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting <a href="https://www.consumerfinance.gov/f/201504\_cfpb\_summary\_your-rights-under-fcra.pdf">www.consumerfinance.gov/f/201504\_cfpb\_summary\_your-rights-under-fcra.pdf</a>, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <a href="https://ag.ny.gov/">https://ag.ny.gov/</a>.